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Attorneys for Defendants
CITY OF BERKELEY, DOUGLAS HAMBLETON,
ALEXANDER McDOUGALL and ERIK KEENE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NADRA FOSTER,

Plaintiff,

v.

BERKELEY POLICE DEPARTMENT; et
al.,

Defendants.

No. C10-03703 SI (ADR)

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE DEPOSITION
OF DR. LISA LATTANZA BEYOND THE
DISCOVERY CUT-OFF

The parties through their counsel herein stipulate that the deposition of Dr. Lisa Lattanza, a treating doctor for plaintiff, currently set for October 25, 2011 at 4:00 p.m. at UCSF Medical Center, 1500 Owens Street, First Floor, San Francisco, CA can be continued to November 22, 2011 at 4:00 p.m. at the same location. The non-expert discovery cutoff is October 28, 2011. Defense counsel for City of Berkeley, Matthew Orebic, requests this continuance of the deposition to a date *beyond* the percipient witness discovery cutoff because (1) Mr. Orebic is needed at a medical procedure for his 88-year old mother that was recently scheduled on an expedited basis, (2) there is no other person or family member as appropriate as Mr. Orebic to transport and care for his mother on October 25, and (3) the next available date for Dr. Lattanza

1 to give a deposition is November 22. Plaintiff's counsel is concerned that parties do not have
2 the authority to make such a stipulation, but is amenable due to human concerns.

3 Dated: October 19, 2011

Respectfully submitted:

4 ZACH COWAN, City Attorney
5 MATTHEW J. OREBIC, Deputy City Attorney
6 LYNNE S. BOURGAULT, Deputy City Attorney

7 By: /s/ Matthew J. Orebic
8 MATTHEW J. OREBIC
9 Attorneys for Defendants
10 CITY OF BERKELEY, , DOUGLAS
11 HAMBLETON, ALEXANDER McDOUGALL
12 and ERIK KEENE

13 Dated: October 19, 2011

Respectfully submitted:

14 By: /s/ Arcolina Panto
15 ARCOLINA PANTO
16 Attorney for Plaintiff
17 NADRA FOSTER

18 Dated: October 19, 2011


Respectfully submitted:

19 NGO LEGAL GROUP, A Professional Corp.

20 By: /s/ Steve Ngo
21 STEVE NGO
22 Attorney for Defendants
23 LOIS WITHERS, KPFA, and PACIFICA
24 FOUNDATION

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: 10/24/11

27 
28 HONORABLE SUSAN ILLSTON
Judge of the U.S. District Court